



CAMILLE M. ABATE, ESQ.
ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates
333 Park Avenue South, Suite 3A, New York, NY 10010
TEL: (212) 227-9003 • FAX: (212) 937-2112

MEMO ENDORSED

February 4, 2021

2/8/21

VIA ECF

Hon. Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Request to travel
As described herein
is granted.

Re: Bail Modification for Kevin McCarron
United States v. Cahill, et al., 20 Cr. 521 (CM)

Dear Judge McMahon:

On behalf of Kevin McCarron, who is currently at liberty on a Personal Recognizance Bond of \$150,000.00 signed by two cosigners, with travel limited to the Southern and Eastern Districts of New York, I respectfully request a bail modification to permit him to travel next week to the District of Virginia, and make additional short trips as necessary.

The reason for this request is that his 15 year old niece, Jenna Sheehy, has suffered a brain aneurism and is having surgery today at Fairfax Hospital in Falls Church, Virginia. Mr. McCarron's sister, Kelly Sheehy, has requested his help with her other two daughters while she and her husband attend to Jenna.

If permitted by Your Honor, Mr. McCarron would travel to his sister's house, at 9400 Weathersfield Drive, Bristo, VA 20136 on Monday, February 8, and remain there until Friday, February 12. He would then return to New York, but may be needed to go back from time to time to assist his sister with the other children and his niece in her recovery.

Mr. McCarron's Pretrial Services Officer, Marie Gerardino, has no objection to this request, and asks only that, if additional trips are necessary, she be given advance notice of those trips. The government has informed me that they will defer to Pretrial on this matter.

Thank you for your consideration of this request.

Sincerely,

Camille M. Abate, Esq.
Attorney for Kevin McCarron

cc: AUSA's Jun Xiang, Danielle Sassone, and Jason Swergold (via ECF)